

**UNITED STATES DISTRICT COURT**

for the  
Eastern District of Wisconsin

Nov 16, 2020  
s/ Daryl Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

2207 Mead Street, Lower, Racine, Wisconsin 53403,  
as more fully described in Attachment A

) Case No. 20 MJ 232

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See attachment A

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

See attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i>                                | <i>Offense Description</i>     |
|--|--------------------------------|
| Title 21, United States Code, Sections 841 and 846 | Illegal narcotics distribution |

The application is based on these facts:

See attached affidavit

- Continued on the attached sheet.
- Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

STEVEN DESCHLER (Affiliate) Digitally signed by STEVEN DESCHLER (Affiliate)  
Date: 2020.11.16 15:47:52 -06'00'

Applicant's signature

DEA TFO Steven Deschler

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephone \_\_\_\_\_ (specify reliable electronic means).

Date: November 16, 2020



Judge's signature

City and state: Milwaukee, WI.

Honorable William E. Duffin

## **AFFIDAVIT FOR SEARCH WARRANTS**

I, Steven Deschler, have been duly sworn on oath, state as follows:

### **I. TRAINING AND EXPERIENCE**

1. I am employed as a Detective with the Kenosha Police Department and have been a law enforcement officer for over 25 years. I was a member of the Kenosha Drug Operations Group from January 2009 to December 2016 and have held a position in other Special Investigation Units since January 2003. I am also a Task Force Officer with the United States Department of Justice Drug Enforcement Administration (DEA) since May 2017. In the course of my duties at the Kenosha Police Department and DEA, I investigate violations of state and federal narcotics laws, money laundering and other violations of federal law.
2. I have had formal training in the investigation of drug trafficking. I have worked with numerous informants in the investigation of drug trafficking in the State of Wisconsin and elsewhere. I have directed informants during controlled buys of controlled substances, performed undercover meetings with individuals, and made monetary payments to drug traffickers for past controlled substances received. I have participated in the execution of numerous state and federal search warrants in which controlled substances, drug paraphernalia, drug proceeds, financial records, and electronic devices with data were seized. I am familiar with the street names of various drugs, including marijuana, heroin, cocaine, cocaine base, fentanyl, and methamphetamine. I am familiar with methods that are commonly used by drug dealers to package and prepare controlled substances for sale in the State of Wisconsin and elsewhere.

3. I have participated or assisted in numerous state and federal search warrants for narcotics related offenses. These warrants involved the search of locations ranging from residences and businesses of targets, their associates and relatives, "stash houses" (houses used as controlled substance/money storage locations), and storage facilities. Evidence searched for, and recovered, in these locations have included controlled substances, records pertaining to the expenditures and profits realized there from, monetary instruments, and various assets purchased with the proceeds of drug trafficking. I have had numerous discussions with other experienced law enforcement officers, and have conducted and been present at numerous interviews of self-admitted narcotics traffickers and cooperating defendants concerning the manner in which drug traffickers and money launderers operate

4. In the course of my employment and experience, I have also become aware of techniques and practices used by narcotics traffickers to avoid detection by law enforcement. Examples of those techniques include the use of multiple locations to conduct narcotics related activities, the use of counter-surveillance, the use of hidden compartments in vehicles to conceal narcotics and currency, the use of pagers, pay phones, mobile telephones, voice mail, texting, instant messaging, email, and the use of numerous associates and "workers" to further their criminal organization. I have also become aware of the various techniques individuals use to conceal the source or nature of drug proceeds. Examples of those techniques include the purchase of assets and financial instruments in nominee names using cash and "structuring" transactions to avoid certain reporting requirements of financial institutions.

5. Based upon my training and experience, I know that a controlled buy is a term which refers to a situation in which a confidential informant or source (herein referred to as CS) works with a law enforcement officer regarding the purchase of a controlled substance from an individual or group of individuals at a known location. The controlled buy process includes a law enforcement officer searching the person and clothing of the CS to make sure that the CS has no controlled substances or money. Then the law enforcement officer gives the CS money and watches the CS walk into the known location. The law enforcement officer watches the CS walk out of the known location a short time later and return to the law enforcement officer. The CS gives the law enforcement officer the controlled substance, which the CS purchased inside the known location and relates to the law enforcement officer the circumstances of the purchase. Finally, the law enforcement officer again searches the CS to make sure that the CS has no controlled substances or money on the CS' person or clothing.

6. Based on my training and experience, and on conversations with other experienced law enforcement officers who have participated in drug trafficking and money laundering related searches, it is my opinion that:

a. People involved in large-scale drug trafficking and/or money laundering almost always keep records of their transactions. Because drug trafficking generates large sums of cash, it requires the keeping of detailed records as to the distribution of narcotics as well as the laundering of the proceeds. Drug traffickers and money launderers typically keep documents demonstrating the purchase of assets, bank records, and other evidence of the accumulation of wealth through their illegal activities, as well as the methods used to launder the proceeds. Such records also typically provide evidence as to the identity of additional criminal associates who are facilitating the laundering of the narcotics proceeds on behalf of the organization. These records, unlike controlled substances, are often maintained for long periods of time, even several years, based on my training and experience. Such records are often maintained under the dominion and control of the drug traffickers and money launderers, and as such, are often kept in their residences, businesses and/or storage facilities.

b. Drug traffickers who amass the proceeds of their enterprise quite often secure their money within secure locations within their dominion and control, often in their residences, businesses, and storage facilities, and often in safes or other secure containers.

c. Large scale drug trafficking and money laundering activities require the cooperation, association, and communication between and among a number of people within the organization. As a result, people who traffic in narcotics or launder money for such organizations will possess documents that identify other members of their organization, such as telephone books, address books, handwritten notations, telephone bills, and documents containing lists of names and addresses of criminal associates.

7. Based upon my training, experience, and participation in financial investigations involving money laundering or other efforts by defendants to conceal assets to avoid the detection of those assets by law enforcement, I have learned that:

a. Individuals attempting to conceal their illegal activities will frequently place assets obtained with proceeds of criminal activity in the names of friends, relatives, trusted associates, or fictitious entities to avoid detection of these assets by the Internal Revenue Service and other government agencies. Even though these assets are in the names of others, the true owners will continue to exercise dominion and control over the use, ownership, and disposition of these assets.

b. Individuals involved in money laundering will utilize checking and savings accounts at financial institutions in the names of relatives, friends, trusted associates, or fictitious business entities. These relatives and associates also conduct financial transactions on the individuals' behalf utilizing monetary instruments, including wire transfers of monies into foreign accounts outside the United States.

c. Individuals involved in money laundering will frequently have some sort of legitimate income or funds and co-mingle their criminal profits with their legitimate funds. This helps conceal the illegal source. Monetary instruments can then be acquired against the funds in the account or a check can simply be written on the account with limited suspicion.

d. Individuals involved in money laundering will frequently allow third parties and/or co-conspirators to make cash deposits to their bank accounts. An individual depositing currency is not typically required to show identification to banking officials, therefore, a third party can go to a bank branch anywhere in the U.S. and deposit cash to an account that is not held in their name. Because the funds are deposited in cash, the account holder, who can be in a different state, can then go to their local bank branch and immediately withdraw the funds in cash. This method of transferring money provides for an almost instantaneous transfer of funds that could not be achieved through the shipping

of bulk currency via common carrier and maintains the virtual anonymity of the third party making the deposit which would not be possible if transferring money through wire a service business such as Money Gram or Western Union.

e. Individuals who are attempting to conceal their illegal activities from the IRS and other government agencies commonly hide records that will establish their true ownership of assets. Such records typically include: bank statements, cashier's check receipts, money order receipts, wire transfer receipts, documents pertaining to storage facilities or safe deposit boxes, automobile titles, property deeds, documents or agreements detailing the true ownership of assets, photographs of the true owners with the concealed assets, or other items such as sales receipts, purchase orders, or shipping invoices.

f. Individuals who seek to hide such records typically keep those records in a place that is secure but easily accessible, such as their personal residences, garages, automobiles, storage facilities, safety deposit boxes, briefcases, purses, and safes or security storage containers.

8. Based upon my training and experience, I know that computer hardware and software may be important to a criminal investigation in two distinct and important respects: (1) the objects themselves may be instrumentalities, fruits, or evidence of crime, and/or (2) the objects may have been used to collect and store information about crimes (in the form of electronic data). Rule 41 of the Federal Rules of Criminal Procedure permits the government to search and seize computer hardware and software which are (1) instrumentalities, fruits, or evidence of crime, or (2) storage devices for information about crime. The analysis of electronically stored data, whether performed on-site or in a laboratory or other controlled environment, may entail any or all of several different techniques. Such techniques may include, but shall not be limited to, surveying various file "directories" and the individual files they contain (analogous to looking at the outside of a file cabinet for the pertinent files, in order to locate the evidence and instrumentalities authorized for seizure by the warrant); "opening" or reading the first few "pages" of such files in order to determine their precise contents; "scanning" storage areas to discover and possibly recover recently deleted data; scanning storage areas for deliberately hidden files;

or performing electronic "keyword" searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are intimately related to the subject matter of the investigation.

9. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. 2510(7), in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

## **II. LOCATIONS TO BE SEARCHED**

10. Based on the information below, I believe that probable cause exists to believe that in the State and Eastern District of Wisconsin, and elsewhere, Ronnie R. MITCHELL, Devereaux A. PATTON, Stevie L. PATTON Jr., Martiese D. HUDSON, Brian J. EDWARDS, Terry N. MCLAIN, Deshawn T. CHATMAN, Joseph C. KNILANS, Angela M. BRZINSKI, April C. DAVIS, Anna N. LAWRENCE, Menachin O. BROWN, Brian N. SAUNDERS JR., Dawneitha R. GANT, Alexander MONETTE, Shane R. TRENTADUE, Lamarr D. MCCLELLAN, and others have committed, are committing, and will commit violations of Title 21, United States Code, Sections 841 and 846 (illegal narcotics distribution (fentanyl and heroin) and illegal narcotics trafficking conspiracy (fentanyl and heroin)).

11. Based on the below information, I also believe probable cause exists to believe that evidence of the above-referenced crimes are located in the following locations:

a. 1913 Center Street, Racine, Wisconsin 53403. This property is utilized by Devereaux A. PATTON and Dawneitha R. GANT. Described as a one-story, single-family residence located on Center Street. The residence has yellow siding and red brick, white trim, and gray shingled roof. The numbers of 1913 are displayed on a white column that is on the left side of the front porch that is located on the west side of the residence. The entry/exit door is located on the west side of the residence.

b. 645 S. Green Bay Road, Apt. #4, Racine, WI 53403. This property is utilized by Alexander MONETTE. Described as a two-story, multi-family residence apartment building located on S. Green Bay Road. The residence has red brick and tan siding, white trim, and gray shingled roof. The numbers of 645 are displayed on a balcony on the west side of the apartment building. The entry/exit doors are located on the north side, east side, and west side of the apartment building.

c. 1630 Kearney Avenue, Lower, Racine, WI 53405. This property is utilized by Martiese D. HUDSON. Described as a two-story, multi-family residence located on Kearney Avenue. The residence has tan siding and red brick, tan trim, and black shingled roof. The numbers of 1630 are displayed on a tan column that is on the right side of the front porch that is located on the east side of the residence. The entry/exit door is located on the east side of the residence.

d. 2207 Mead Street, Lower, Racine, WI 53403. This property is utilized by Menachin O. BROWN and Jennifer SCHWARTZ. Described as a two-story, multi-family residence located on Mead Street. The residence has red siding and brown brick, white trim, and gray shingled roof. The numbers of 2207 are displayed on the right side of the front door frame that is located on the west side of the residence. The entry/exit door is located on the west side of the residence.

e. 2201 20<sup>th</sup> Street, Unit #2, Racine, WI 53403. This property is utilized by Devereaux A. PATTON and Jazmyne MORRIS. Described as a one-story, multi-family residence located on 20<sup>th</sup> Street. The residence has charcoal gray siding, white trim, and black shingled roof. The numbers of 2201 are displayed on the gray siding on the north side of the residence. The number 2 is attached to the right side of the entry door. The entry/exit door has a white colored screen door and is located on the west side of the residence.

f. 1931 Mead Street, Racine, WI 53403. This property is utilized by Ronnie R. MITCHELL and Kimberly STEWARD. Described as a two-story, multi-family residence located on Mead Street. The residence has tan and brown siding, white trim, and brown shingled roof. The numbers of 1931 are displayed on the tan siding, to the left of the garage door. The entry/exit door has a brown colored screen door and is located on the north side of the residence.

12. I have obtained the facts set forth in this affidavit through my personal participation in the investigation described below, from my review of oral and written reports of other law enforcement officers participating in this and related investigations, records, documents, and other evidence obtained during this investigation. The investigation to date has involved traditional law enforcement methods, including, but not limited to: confidential informants, undercover, interviews, documentary evidence, phone analysis, physical surveillance, and an order authorizing the interception of wire communications of Ronnie R. MITCHELL and the phone number utilized by the MITCHELL DTO members.

13. Because this affidavit is submitted for the limited purpose of securing a search warrant for the above described residences, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for the requested search warrants.

### **III. PROBABLE CAUSE**

14. Between approximately December 1, 2019 and November 2020, Special Agents and Task Force Officers from the DEA Tactical Diversion Squad (TDS) 67 from the DEA Milwaukee District Office conducted an investigation into the MITCHELL Drug Trafficking Organization (DTO). During the months of December 2019 to May 2019, three Racine County Sheriff's Office-Metro Drug Unit (MDU) Confidential Sources (CS) and a Source of Information (SOI) provided information about numerous individuals involved in the processing, packaging, and distribution of heroin/fentanyl, cocaine base ("crack"), Oxycodone pills, Suboxone strips, and ecstasy in the City of Racine, State of Wisconsin. During the month of December 2019 to present, MDU agents have utilized

three CS's to conduct over 80 controlled purchases of heroin/fentanyl, cocaine base ("crack"), Oxycodone pills, Suboxone strips, and ecstasy. All three CS's and the SOI identified five locations in Racine, WI and the CS's information assisted with establishing probable cause for search warrants at all six of the locations.

15. Based on information provided from the three CS's, recorded audio phone calls during the controlled buys, or surveillance/observations made by MDU agents during the controlled buys; case agents were able to develop a hierarchy structure in the MITCHELL DTO. Ronnie MITCHELL was identified as the source of supply of the DTO. Devereaux PATTON was identified as leader of the DTO. Joseph HARMON, Menachin O. BROWN, April C. DAVIS, Angela M. BRZINSKI, Martiese D. HUDSON, Joseph C. KNILANS, Terry T. MCLAIN, Stevie L. PATTON Jr., Willie CHATMAN, Deshawn T. CHATMAN, Brian J. EDWARDS, Anna N. LAWRENCE, Alexander MONETTE, Shane TRENTADUE, Lamarr D. MCCLELLAN, and Dawneitha GANT were identified as "runners" and selling the controlled substances for the MITCHELL DTO.

a. On March 31, 2020, TFO Steven Deschler and MDU Agent Tom Knaus debriefed a reliable confidential source (hereinafter referred to as "CS-2"). CS-2 provided detailed information regarding the MITCHELL DTO to include but not limited to multiple phone numbers members are utilizing, vehicles members are driving, and where DTO members are residing. CS-2 was introduced to members of the MITCHELL DTO by Vanessa PERRY (aka NESSA). Shortly after being introduced to several members of the MITCHELL DTO, CS-2 proceeded to purchase heroin/fentanyl from members of the DTO. CS-2 stated that during the month of November 2019 through March 2020, the CS purchased heroin/fentanyl approximately 60 times from members of the MITCHELL

DTO. The CS estimated that s/he purchased a total of 37.5 grams of heroin/fentanyl from members of the MITCHELL DTO.

b. CS-2 has provided information about the membership, structure, and customs of the drug trafficking organization involving the MITCHELL DTO. CS-2 has positively identified several members through a driver's license and/or booking photograph. CS-2 has conducted several, consensually-recorded conversations with MITCHELL DTO members, both in person and on the telephone during the course of this investigation. CS2 has conducted controlled purchases of heroin/fentanyl from DTO members. CS-2's information concerning this DTO has been corroborated by another Source of Information, telephone records, Wisconsin Department of Transportation records, circuit court records, physical surveillance, and through controlled drug purchases, and consensually-recorded conversations and phone calls that CS-2 has had with MITCHELL DTO members. CS-2's information has never been found to be false or misleading.

c. Your affiant know that CS-2 has worked as a source for the Racine County Sheriff's Office-Metro Drug Unit since January of 2019. CS-2 has worked as a source for DEA since May of 2020. CS-2 has a criminal history that includes an arrest for non-criminal retail theft. CS-2 has no pending criminal cases and is receiving monetary compensation in return for this information and assistance. For these reasons, your affiant considers CS2 to be reliable.

16. On April 2, 2020, TFO Steven Deschler and MDU Agent Tom Knaus debriefed a reliable confidential source (hereinafter referred to as "CS-1"). CS-1 provided detailed information regarding the MITCHELL DTO to include but not limited to multiple phone numbers members are utilizing, vehicles members are driving, and where DTO members

are residing. CS-1 was introduced to members of the MITCHELL DTO by an unknown white female who is known as "AMBER" (LNU). Shortly after being introduced to several members of the MITCHELL DTO, CS-1 proceeded to purchase heroin/fentanyl, cocaine base ("crack"), and Suboxone strips from members of the MITCHELL DTO. CS-1 stated that during the summer of 2019 through March of 2020, s/he has purchased heroin/fentanyl, cocaine base ("crack"), and/or Suboxone film strips approximately 500 times from members of the MITCHELL DTO. The CS estimated that s/he purchased a total of 72.5 grams of heroin/fentanyl, 556.5 grams of cocaine base ("crack"), and eight Suboxone film strips from members of the MITCHELL DTO.

- a. CS-1 has provided information about the membership, structure, and customs of the drug trafficking organization involving the MITCHELL DTO. CS-1 has positively identified several members through a driver's license and/or booking photograph. CS-1 has conducted several, consensually-recorded conversations with MITCHELL DTO members, both in person and on the telephone during the course of this investigation. CS1 has conducted controlled purchases of heroin/fentanyl, cocaine base ("crack"), and/or Suboxone strips from DTO members. CS-1's information concerning this DTO has been corroborated by another Source of Information, telephone records, Wisconsin Department of Transportation records, circuit court records, physical surveillance, and through controlled drug purchases, and consensually-recorded conversations and phone calls that CS-1 has had with MITCHELL DTO members. CS-1's information has never been found to be false or misleading.
- b. Your affiant know that CS-1 has worked as a source for the Racine County

Sheriff's Office-Metro Drug Unit since January of 2020. CS-1 has worked as a source for DEA since May of 2020. CS-1 has a criminal history that includes arrests for escape-criminal arrest, resisting or obstructing an officer, criminal trespass to a dwelling, contempt of court - disobey order, possession of drug paraphernalia, criminal damage to property, carrying a concealed weapon, theft - movable property and prostitution. CS-1 has no pending criminal cases and is receiving monetary compensation in return for this information and assistance. For these reasons, your affiant considers CS-1 to be reliable.

17. On April 13, 2020, TFO Steven Deschler and MDU Agent Jim Muller debriefed a reliable confidential source (hereinafter referred to as "CS-3"). CS-3 provided detailed information regarding the MITCHELL DTO to include but not limited to multiple phone numbers members are utilizing, vehicles members are driving, and where DTO members are residing. CS-3 was introduced to members of the MITCHELL DTO by Joseph C. KNILANS. Shortly after being introduced to several members of the MITCHELL DTO, CS-3 proceeded to purchase heroin/fentanyl and/or cocaine base ("crack") from members of the MITCHELL DTO. CS-3 stated that during the month of December 2019 through May of 2020, s/he has purchased heroin/fentanyl and/or cocaine base ("crack"), approximately 100 times from members of the MITCHELL DTO. The CS estimated that s/he purchased a total of 33.5 grams of heroin/fentanyl and 2.1 grams of cocaine base ("crack") from members of the MITCHELL DTO.

a. CS-3 has provided information about the membership, structure, and customs of the drug trafficking organization involving the MITCHELL DTO. CS-3 has positively identified several members through a driver's license and/or booking photographs. CS-3 has conducted several, consensually-recorded conversations with MITCHELL DTO

members, both in person and on the telephone during the course of this investigation. CS-3 has conducted controlled purchases of heroin/fentanyl and/or cocaine base ("crack") from DTO members. CS-3's information concerning this DTO has been corroborated by another Source of Information, telephone records, Wisconsin Department of Transportation records, circuit court records, physical surveillance, and through controlled drug purchases, and consensually-recorded conversations and phone calls that CS-3 has had with MITCHELL DTO members. CS-3's information has never been found to be false or misleading.

b. Your affiant know that CS-3 has worked as a source for the Racine County Sheriff's Office-Metro Drug Unit since December of 2019. CS-3 has worked as a source for DEA since May of 2020. CS-3 has a criminal history that includes arrests for failure to support, bail jumping, and DUI-aggravated battery, possession of drug paraphernalia, retail theft, and domestic abuse-violate a domestic abuse temporary restraining order. CS-3 has no pending criminal cases and is receiving monetary compensation in return for this information and assistance. For these reasons, your affiant considers CS-3 to be reliable.

18. On May 27, 2020, TFO Steven Deschler and TFO Jessie Lewis debriefed a reliable source of information (hereinafter referred to as "SOI"). SOI provided detailed information regarding the MITCHELL DTO to include but not limited to multiple phone numbers members are utilizing, vehicles members are driving, and where DTO members are residing. SOI was introduced to members of the MITCHELL DTO by "Rogelio". Shortly after being introduced to several members of the MITCHELL DTO, SOI proceeded to purchase heroin/fentanyl and/or cocaine base ("crack") from members of the MITCHELL DTO. SOI stated that during the month of April 2019 through May of 2020,

s/he has purchased heroin/fentanyl and/or cocaine base ("crack"), approximately 1165 times from members of the MITCHELL DTO. The SOI estimated that s/he purchased a total of approximately 321.5 grams of heroin/fentanyl and approximately 162.5 grams of cocaine base ("crack") from members of the MITCHELL DTO.

a. SOI has provided information about the membership, structure, and customs of the drug trafficking organization involving the MITCHELL DTO. SOI has positively identified several members through a driver's license and/or booking photograph. SOI's information concerning this DTO has been corroborated by another Source of Information, telephone records, Wisconsin Department of Transportation records, circuit court records, physical surveillance, and through controlled drug purchases with the three CSs, and consensually recorded conversations and phone calls that the CSs have had with MITCHELL DTO members. SOI is cooperating in an attempt to earn consideration in a state prosecution. SOI's information has never been found to be false or misleading.

b. Your affiant know that SOI has worked as a source for the Racine County Sheriff's Office Metro Drug Unit since May of 2020. SOI has worked as a source for DEA since June of 2020. SOI has a criminal history that includes arrests for resisting or obstructing an officer, possession of narcotic drugs, possession of drug paraphernalia, possession amphetamine/LSD/psilocin, criminal damage to property, and bail jumping misdemeanor. SOI has a pending criminal cases and is receiving cooperation in return for this information and assistance. For these reasons, your affiant considers SOI to be reliable.

### **Controlled Purchase of Narcotics**

*CS-1 Controlled Buys Information:*

20. Racine County Sheriff's Office-Metro Drug Unit Agents and Task Force Officers from the DEA Tactical Diversion Squad (TDS) 67 from the DEA Milwaukee District Office utilized CS-1 to conduct approximately thirty controlled buys from MITCHELL DTO members from January of 2020 through October of 2020.

***Controlled Buy on January 17, 2020.***

21. On January 17, 2020, CS-1 communicated with Martiese D. HUDSON at (224) 717- 6253 to arrange the purchase of 0.5 grams of heroin (suspected fentanyl) for \$60 and 0.4 grams of "crack" cocaine for \$40.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus met with CS-1 in order to conduct the heroin (suspected fentanyl) and "crack" cocaine purchase from Martiese D. HUDSON (aka "YOUNG BOY") and Stevie L. PATTON Jr.

b. At approximately 1:55 p.m., MDU Agent James Muller was conducting surveillance at 1913 Center Street, in the City of Racine when he observed a green Chevrolet Spark bearing Wisconsin temporary registration S2737F, parked at the residence. At approximately 2:15 p.m., Agent Muller observed two black males exit out of the 1913 Center Street residence and then enter into the green Chevrolet Spark. MDU Agent Muller conducted moving surveillance of the green Chevrolet Spark over to a residence located at 1720 Grand Avenue, in the City of Racine. MDU Agent Muller ended surveillance. At approximately 2:26 p.m., MDU Agent Muller reestablished surveillance near the 1720 Grand Avenue residence. MDU Agent Muller observed the green Chevrolet Spark parked in the driveway to the residence.

c. MDU Agent Knaus (working in an undercover capacity) drove CS-1 over to the

1700 block of Grand Avenue and dropped CS-1 off. MDU Agent Knaus observed CS-1 walk over to the green Chevrolet Spark that was parked in the driveway for 1720 Grand Avenue. At approximately 2:37 p.m., MDU Agent Knaus observed CS-1 enter into rear driver's side seat of the green Chevrolet Spark. After a brief period of time, MDU Agent Knaus observed CS-1 exit the green Chevrolet Spark and walk back to his MDU vehicle. CS-1 entered back into Agent Knaus's MDU vehicle and then they drove out of the area. MDU Agent Knaus retrieved from CS-1 a clear plastic baggie corner containing a gray chunky/powdery substance and two plastic baggie corner ends that contained white chunky substance. CS-1 stated s/he met with Martiese D. HUDSON and Stevie L. PATTON Jr. in the green Chevrolet Spark in the driveway to 1720 Grand Avenue. CS-1 stated PATTON Jr. gave CS-1 the heroin (suspected fentanyl) and "crack" cocaine. CS-1 stated s/he gave PATTON Jr. the \$100 of buy money. After the deal was complete, CS-1 exited the green Chevrolet Spark and walked back over to MDU Agent Knaus' MDU vehicle.

d. MDU Agent Knaus tested a small sample of the gray chunky/powdery (suspected heroin/fentanyl) utilizing a NARK II test kit and it tested positive for the presence of heroin. MDU Agent Knaus tested a small sample of the white chunky substance utilizing a NARK II test kit and it tested positive for the presence of cocaine base ("crack").

***Controlled Buy on March 20, 2020.***

22. On March 20, 2020, CS-1 communicated with Stevie L. PATTON Jr. at (224) 717-6253 to arrange the purchase of 3.5 grams of "crack" cocaine for \$225 and three Suboxone strips for \$30.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus met with CS-1 in order to conduct the "crack" cocaine and Suboxone strips purchase from PATTON Jr. and April C. DAVIS.

b. MDU Sgt. Keith Dobesh was conducting surveillance at 1913 Center Street, Racine, WI when he observed a blue Mitsubishi Outlander bearing Wisconsin temporary registration S2772F parked at the residence. MDU Sgt. Keith Dobesh observed Stevie L. PATTON Jr. exit out of 1913 Center Street and enter into the blue Mitsubishi Outlander. MDU Agents conducted moving surveillance of the blue Mitsubishi Outlander from 1913 Center Street to the 1900 block of Grand Avenue, in the City of Racine, the buy location.

c. MDU Agent Knaus (working in an undercover capacity) drove CS-1 to the 1900 block of Grand Avenue and parked his MDU vehicle. At approximately 10:40 a.m., MDU Agent Knaus observed the blue Mitsubishi Outlander bearing Wisconsin temporary registration S2772F arrive and park near his MDU vehicle. MDU Agent Knaus observed CS-1 exit out of his vehicle, walk over to the blue Mitsubishi Outlander, and enter into the rear passenger's side door of the vehicle. After a brief period of time, MDU Agent Knaus observed CS-1 exit the blue Mitsubishi Outlander and walk back to his MDU vehicle. CS-1 entered Agent Knaus's MDU vehicle and he drove out of the area. MDU Agent Knaus retrieved from CS-1 a clear plastic knotted sandwich baggie containing a white chunky substance and three Suboxone strips. CS-1 stated s/he met with April C. DAVIS and Stevie PATTON Jr. in the blue Mitsubishi Outlander, in the 1900 block of Grand Avenue. CS-1 stated s/he gave April C. DAVIS the \$255 of buy money. In return, CS-1 stated PATTON Jr. gave CS-1 the crack cocaine and Suboxone strips. After the deal was complete, CS1 exited the blue Mitsubishi Outlander and walked back over to Agent

Knaus' vehicle.

d. MDU Agent Knaus tested a small sample of the white chunky substance utilizing a NARK II test kit and it tested positive for the presence of cocaine base ("crack").

e. Immediately after the controlled buy concluded, MDU Agents conducted moving surveillance of the blue Mitsubishi Outlander from the buy location to 1913 Center Street, Racine, WI. Upon arrival at the residence, MDU Agents observed Devereaux A. PATTON arrive in a blue Chevrolet van bearing Wisconsin registration AHN-2270. MDU Agents observed Stevie L. PATTON Jr. and Devereaux A. PATTON meet outside of the residence and then walk into 1913 Center Street together.

***Controlled Buy on April 2, 2020.***

23. On April 2, 2020, CS-1 communicated with Brian J. EDWARDS at (224) 717-6253 to arrange the purchase of heroin (suspected fentanyl).

a. At approximately 4:06 p.m., MDU Agent James Muller was conducting surveillance at EDWARDS' residence, 3011 Durand Avenue, Apt. 212, Racine, Wisconsin. MDU Agent Muller observed EDWARDS arrive at his residence, operating a silver Ford Focus bearing a Wisconsin temporary registration of S2791F. MDU Agent Muller observed EDWARDS park the vehicle and then walk into the apartment building.

b. At approximately 4:13 p.m. MDU Agent Tom Knaus met with CS-1 in order to conduct the heroin purchase from Brian J. EDWARDS. MDU Agent Knaus had CS-1 complete a recorded phone call to EDWARDS at (224) 717-6253. CS-1 initially asked EDWARDS if he had crack cocaine and heroin (suspected fentanyl) for sale. EDWARDS replied to CS-1 that he had heroin (suspected fentanyl), however he did not have crack

cocaine and that he had to wait to hear from the "big man". EDWARDS told CS-1 that he would meet

s/he at a Walgreens located on Durand Avenue (east of EDWARDS's residence) in approximately 10 minutes from the time of the recorded phone call.

c. At approximately 4:32 p.m. MDU Agent James Muller was still conducting surveillance EDWARDS' residence when he observed EDWARDS and a heavy set black male (believed to be Ronnie R. MITCHELL) exit the apartment building. MDU Agent James Muller observed both individuals enter into the silver Ford Focus and drive eastbound towards the Walgreens.

d. While EDWARDS and the black male were driving eastbound on Durand Avenue, CS-1 told MDU Agent Knaus that s/he had just spoken with "E" (identified as being an alias for Ronnie R. MITCHELL) and was told by him that EDWARDS and he were on their way to meet CS-1. MDU Agents followed the silver Ford Focus to Devereaux A. PATTON's residence, 1913 Center Street, Racine, WI. MDU Agents observed the heavy set black male exit the Ford Focus and enter into a gray Ford F150 bearing Wisconsin registration RW7924.

e. At approximately 4:52 p.m., CS-1 told MDU Agent Knaus that s/he called the (224) 717- 6253 again and this time spoke with Stevie L. PATTON Jr. (aka "DREADS" and/or "NEPHEW"). CS-1 was told by Stevie L. PATTON Jr. that EDWARDS and "E" (Ronnie MITCHELL) were not coming and that PATTON Jr. had changed shifts and just taken over the dope cellular phone and would be delivering the heroin to CS-1.

f. At approximately 5:04 p.m., MDU Agents observed Stevie L. PATTON Jr. operating the same Ford Focus that EDWARDS was operating earlier. MDU Agents

conducted moving surveillance of the Ford Focus to EDWARDS's residence, 3011 Durand Avenue, Racine, WI. After a short period of time, MDU Agents continued moving surveillance of the Ford Focus from 3011 Durand Avenue to 1913 Center Street, Racine, WI.

g. At approximately 5:14 p.m., MDU Agent Knaus had CS-1 complete another recorded phone call to (224) 717-6253. According to CS-1, Stevie L. PATTON Jr. answered the phone and instructed CS-1 to meet him at the intersection of DeKoven Avenue and Grand Avenue, in the City of Racine, to complete the drug transaction.

h. MDU Agent Knaus (working in an undercover capacity) drove CS-1 to the 1900 block of Grand Avenue. At approximately 5:40 p.m., MDU Agent Knaus observed Stevie L. PATTON Jr. arrive in the area of where MDU Agent Knaus' vehicle was parked. MDU Agent Knaus observed PATTON Jr. operating the same silver Ford Focus (Wisconsin temporary plate S2791F) that EDWARDS was operating earlier that afternoon. MDU Agent Knaus saw PATTON Jr. park directly behind his MDU vehicle. MDU Agent Knaus observed CS-1 exit his vehicle and then walk over to the silver Ford Focus and enter into the front passenger's seat. After a short period of time, MDU Agent Knaus observed CS-1 exchange US currency with PATTON Jr., exit the silver Ford Focus, and walk back to his vehicle. CS-1 entered Agent Knaus' MDU vehicle and then they drove out of the area. MDU Agent Knaus retrieved from CS-1 two knotted plastic baggie corners containing an off- white chunky/powdery substance. CS-1 stated s/he met with Stevie L. PATTON Jr. in the silver Ford Focus that was parked directly behind MDU Agent Knaus' vehicle. CS-1 stated PATTON Jr. gave CS-1 the heroin. CS-1 stated s/he

gave PATTON Jr. the \$120 of buy money. After the deal was complete, CS-1 exited the silver Ford Focus and walked back over to MDU Agent Knaus' MDU vehicle.

- i. MDU Agent Knaus tested a small sample of the off-white chunky/powdery substance utilizing a NARK II test kit and it tested positive for the presence of heroin.

***Controlled Buy on April 16, 2020.***

24. On April 16, 2020, CS-1 communicated with Ronnie R. Mitchell at (262) 412-2027 to arrange the purchase of 3 grams of heroin (suspected fentanyl) and 1 gram of crack cocaine for a total of \$400.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus met with CS-1 in order to conduct the heroin (suspected fentanyl) and crack cocaine purchase from Ronnie R. MITCHELL. MDU Agent Knaus had CS-1 complete a recorded phone call to MITCHELL at (262) 412-2027. MITCHELL answered the phone and CS-1 ordered \$400 worth of heroin and crack cocaine.

MITCHELL told CS-1 that he would send over Menachin O. BROWN to meet CS-1 in the 1300 block of Rosalind Avenue in Racine, WI to complete the drug transaction.

b. At approximately 1:21 p.m., MDU Agents James Muller and Sgt. Keith Dobesh were conducting surveillance at Devereaux A. PATTON's residence, 1913 Center Street, Racine, WI when they observed Menachin O. BROWN and an unknown female exit the residence and enter a maroon Chevrolet Trailblazer bearing Wisconsin registration ML5408. MDU Agents conducted moving surveillance of the maroon Chevrolet Trailblazer from 1913 Center Street to BROWN's residence, 2207 Mead Street Lower, in the Village of Mount Pleasant. MDU Agents observed BROWN exit the maroon Chevy Trailblazer and walk into his residence utilizing the front door. At approximately 1:27

p.m., MDU Agents observed BROWN and the unknown female exit the residence utilizing the front door, enter back into the maroon Chevrolet Trailblazer, and then drive back to 1913 Center Street. At approximately 2:15 p.m., MDU Agents observed BROWN exit 1913 Center Street, enter the maroon Chevrolet Trailblazer, and then drive to the 1300 block of Rosalind Avenue, the buy location.

c. MDU Agent Knaus (working in an undercover capacity) drove CS-1 over to the 1300 block of Rosalind Avenue and waited for BROWN to arrive. At approximately 2:21 p.m., MDU Agent Knaus observed the maroon Chevrolet Trailblazer arrive in the 1300 block of Rosalind Avenue where he was parked with CS-1. MDU Agent Knaus observed CS-1 exit his vehicle and enter into the rear passenger seat of the maroon Chevrolet Trailblazer. The vehicle drove away with CS-1 in it, and then returned shortly. The vehicle parked behind MDU Agent Knaus' vehicle. MDU Agent Knaus was able to observe that BROWN was the operator of the vehicle and an unknown female was seated in the front passenger's seat. MDU Agent Knaus observed CS-1 exit the maroon Chevy Trailblazer and return back to his vehicle. CS-1 entered Agent Knaus' MDU vehicle and then they drove out of the area. MDU Agent Knaus retrieved from CS-1 a clear plastic baggie corner containing a gray powdery substance and one plastic baggie corner end that contained a white chunky substance. CS-1 stated s/he met with Menachin BROWN and an unknown female in the maroon Chevrolet Trailblazer in the 1300 block of Rosalind Avenue. CS-1 stated BROWN gave CS-1 the heroin and crack cocaine. CS-1 stated s/he gave BROWN the \$400 of buy money. After the deal was complete, CS-1 exited the maroon Chevrolet Trailblazer and walked back over to MDU Agent Knaus' MDU vehicle.

d. MDU Agent Knaus tested a small sample of the gray chunky/powder utilizing a NARK II test kit and it tested positive for the presence of heroin. MDU Agent Knaus tested a small sample of the white chunky substance utilizing a NARK II test kit and it tested positive for the presence of cocaine base (“crack”).

***Controlled Buy on May 1, 2020.***

25. On May 1, 2020, CS-1 communicated with Ronnie R. MITCHELL at (262) 412-2027 to arrange the purchase of 3 grams of heroin (suspected fentanyl) and 1 gram of “crack” cocaine for a total of \$400.

a. Racine County Sheriff’s Office-Metro Drug Unit (hereinafter referred to as “MDU”) Agent Tom Knaus met with CS-1 in order to conduct the heroin (suspected fentanyl) and “crack” cocaine purchase from Ronnie R. MITCHELL (aka “E”). MDU Agent Knaus was told by CS-1 that at approximately 1:22 p.m., s/he called MITCHELL at (262) 412-2027. MITCHELL answered the phone and CS-1 ordered \$400 worth of heroin and “crack” cocaine from MITCHELL and arranged for MITCHELL to meet CS-1 at approximately 3:30 p.m., in the 1300 block of Rosalind Avenue. MITCHELL told CS-1 that he would send over BROWN to meet CS-1 in the 1300 block of Rosalind Avenue to complete the drug transaction.

b. At approximately 2:54 p.m., MDU Agent Bob Christman was conducting surveillance at Menachin O. BROWN’s residence, 2207 Mead Street Lower, in the Village of Mount Pleasant, when he observed a maroon Chevy Trailblazer bearing Wisconsin registration ML5408 parked near the residence. At approximately 3:28 p.m., MDU Agent Christman observed BROWN exit his residence and enter into the operator’s seat of the maroon Chevy Trailblazer. MDU Agent Christman conducted a moving

surveillance of the maroon Chevy Trailblazer over to the drug transaction location in the 1300 block of Rosalind Avenue.

c. MDU Agent Knaus (working in an undercover capacity) drove CS-1 over to the 1300 block of Rosalind Avenue and waited for BROWN to arrive. At approximately 3:36 p.m., MDU Agent Knaus observed the maroon Chevy Trailblazer arrive in the 1300 block of Rosalind Avenue where he was parked with CS-1. MDU Agent Knaus observed CS-1 exit out of his vehicle and then enter into the front passenger's seat of the maroon Chevy Trailblazer. After a short period of time, MDU Agent Knaus observed CS-1 exit out of the maroon Chevy Trailblazer and return back to his vehicle. CS-1 entered back into Agent Knaus' MDU vehicle and then they drove out of the area. MDU Agent Knaus retrieved from CS-1 a knotted plastic baggie corner containing a tan chunky/powdery substance and one knotted plastic baggie corner end that contained a white chunky substance. CS-1 stated s/he met with Menachin O. BROWN in the maroon Chevy Trailblazer in the 1300 block of Rosalind Avenue. CS-1 stated BROWN gave CS-1 the heroin (suspected fentanyl) and "crack" cocaine. CS-1 stated s/he gave BROWN the \$400 of buy money. After the deal was complete, CS-1 exited the maroon Chevy Trailblazer and walked back over to MDU Agent Knaus' MDU vehicle.

d. MDU Agent Knaus tested a small sample of the tan chunky/powder utilizing a NARK II test kit and it tested positive for the presence of fentanyl. MDU Agent Knaus tested a small sample of the white chunky substance utilizing a NARK II test kit and it tested positive for the presence of cocaine base ("crack").

e. After the controlled buy was completed, MDU Agents conducted moving surveillance of the maroon Chevy Trailblazer back to BROWN's residence, 2207 Mead

Street Lower, in the Village of Mount Pleasant. MDU agents observed BROWN walk back into his residence utilizing the front door.

***Controlled Buy on May 4, 2020.***

26. On May 4, 2020, CS-1 communicated with Stevie L. PATTON Jr. Nat (224) 717-6253 to arrange the purchase of 1 gram of heroin (suspected fentanyl) and 0.4 gram of “crack” cocaine for \$160.

a. Racine County Sheriff’s Office-Metro Drug Unit (hereinafter referred to as “MDU”) Agent Tom Knaus met with CS-1 in order to conduct the heroin and “crack” cocaine controlled buy from Stevie L. PATTON Jr.

b. MDU Agent Knaus had CS-1 complete a recorded phone call to Stevie L. PATTON Jr. at (224) 717-6253. PATTON Jr. answered the phone and CS-1 ordered \$160 worth of heroin (suspected fentanyl) and “crack” cocaine. PATTON Jr. told CS-1 that he was not coming and that another person (later identified as Deshawn T. CHATMAN) would meet CS-1 at Fine Fare Foods located at 1819 Durand Avenue, Mount Pleasant, Wisconsin to complete the drug transaction.

c. MDU Agent Drew Wroblewski was conducting surveillance at 1913 Center Street, Racine, WI when he observed a red Ford Focus bearing Wisconsin temporary registration S2781F parked at the residence. At approximately 9:25 a.m., MDU Agent Wroblewski observed a black male (later identified as being Deshawn T. CHATMAN) exit out of the 1913 Center Street residence and then enter into the red Ford Focus. MDU Agent Wroblewski conducted moving surveillance of the red Ford Focus from 1913 Center Street to the buy location, Fine Fare Foods.

d. MDU Agent Knaus (working in an undercover capacity) drove CS-1 to the area of Fine Fare Foods and dropped CS-1 off. At approximately 9:30 a.m., MDU Agent Knaus observed the red Ford Focus arrive at Fine Fare Foods. MDU Agent Knaus observed CS-1 enter into the front passenger's seat of the red Ford Focus. MDU Agent Knaus observed the red Ford Focus drive away and then turn around on Phillips Avenue and drop off CS-1 near Fine Fare Foods. CS-1 walked back to MDU Agent Knaus' vehicle, entered back into his vehicle, and Agent Knaus drove out of the area. MDU Agent Knaus retrieved two plastic knotted baggie corners that contained a tan powdery substance and two plastic baggie corners that contained a white chunky substance from CS-1. CS-1 stated s/he met with a black male that identified himself as "D'SHAUN" in the red Ford Focus at Fine Fare Food. CS-1 stated s/he gave "D'SHAUN" (later positively identified by CS-1 as Deshawn T. CHATMAN) the \$160 of buy money. In return, CS-1 stated "D'SHAUN" gave CS-1 the heroin and "crack" cocaine. After the deal was complete, CS-1 exited the red Ford Focus and walked back over to MDU Agent Knaus' MDU vehicle.

e. MDU Agent Knaus tested a small sample of the tan powdery substance utilizing a NARK II test kit and it tested positive for the presence of fentanyl. MDU Agent Knaus tested a small sample of the white chunky substance utilizing a NARK II test kit and it tested positive for the presence of cocaine base ("crack").

***Controlled Buy on August 27, 2020.***

27. On August 27, 2020, CS-1 communicated with Ronnie R. MITCHELL at (262) 321-4730 to arrange the purchase of 3.5 grams of heroin (suspected fentanyl) and twenty 30 mg Oxycodone pills for \$950.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as

“MDU”) Agents Tom Knaus and Donald Vandervest met with CS-1, in order to conduct the heroin and Oxycodone pills purchase from MITCHELL.

b. At approximately 1:08 p.m., MDU Agents Knaus and Vandervest had CS-1 complete a recorded phone call to MITCHELL. MITCHELL answered the phone and CS-1 told MITCHELL that s/he was ready to order the heroin and Oxycodone pills. MITCHELL told CS- 1 that he was checking on the status of the pills and that he would call CS-1 back. Several minutes later, MITCHELL called CS-1 back and asked CS-1 if s/he wanted to also purchase eight Suboxone filmstrips. CS-1 agreed to buy the Suboxone filmstrips, along with the heroin and Oxycodone pills. MITCHELL instructed CS-1 to meet him at the intersection of Case Avenue and DeKoven Avenue.

c. Prior to MDU Agents Knaus and Vandervest meeting with CS-1, MDU Agent Jim Muller was conducting surveillance at 2201 20<sup>th</sup> Street #2, Racine, WI when he observed a maroon Chevrolet Express van bearing Illinois temporary registration 410V017 parked at the residence, at approximately 12:23 p.m. At approximately 12:37 p.m., MDU Sgt. Dobesh conducted moving surveillance of the maroon Chevrolet Express van from 2201 20<sup>th</sup> Street #2, Racine, WI to Taylor Mart gas station, 1813 Taylor Avenue, Racine, WI. MDU Sgt. Dobesh positively identified the operator of the maroon Chevrolet Express van as Devereaux A. PATTON. At approximately 12:48 p.m., MDU Agent Robert Christman observed Shane R. TRENTADUE walking towards D. PATTON’s location.

d. MDU Agents Knaus and Vandervest (working in an undercover capacity) drove CS-1 over to the area of Case Avenue and DeKoven Avenue. As the MDU Agents were waiting with CS-1, they were told by CS-1 that s/he observed a gold Kia Sedona minivan

bearing Wisconsin registration KA7936, which is utilized by members of the DTO, park to the south of their location. At approximately 1:28 p.m., CS-1 exited out of the MDU vehicle and walked over to the gold Kia Sedona and entered into the front passenger seat. Prior to the controlled buy, MDU Sgt. Dobesh observed Angela M. BRZINSKI operating the gold Kia Sedona minivan.

e. While CS-1 was inside of the gold Kia Sedona minivan, MDU Agent Jeff Chiapete was conducting surveillance at 2201 20<sup>th</sup> Street, Unit #2, Racine, WI, when he observed a black male exit a tan Ford Explorer bearing Illinois registration BF35248 which was parked across the street from 2201 Street, #2. MDU Agent Chiapete observed the black male walk over to the maroon Chevrolet Express van and enter into the vehicle. MDU Agent Chiapete observed the maroon Chevrolet Express van drive out of the area.

f. At approximately 1:30 p.m., MDU Agent Knaus observed the maroon Chevrolet Express van drive pass CS-1 and MDU Agent Knaus' location and then observed the van being parked in the 1900 block of Case Avenue. MDU Agent Knaus observed that D. PATTON was the operator of the van and also observed Ronnie R. MITCHELL was seated in the front passenger's seat. As soon as the maroon Chevrolet Express parked, MDU Agent Knaus observed CS-1 exit out of the gold Kia Sedona, walk to the maroon Chevrolet Express van, and have contact with the occupants of the vehicle. After the CS-1 made contact with the occupants, MDU Agent Knaus observed CS1 return back to the gold Kia Sedona for a short period of time and then returned back to MDU Agents Knaus and Vandervest's MDU vehicle. MDU Agent Knaus retrieved from CS-1 eight Suboxone filmstrips, a knotted plastic sandwich baggie that contained the 20 Oxycodone pills, and seven plastic knotted baggie corners that contained a brown

chunky/powdery substance. CS-1 stated s/he met with a white female named "Angie" (Angela BRZINSKI) in the gold Kia Sedona minivan. CS-1 asked BRZINSKI if CS-1 could give BRZINSKI the money for the controlled substances. BRZINSKI told CS-1 that MITCHELL was about to arrive to their location and that CS-1 could pay him when he shows up. As CS-1 was speaking with BRZINSKI, CS-1 observed D. PATTON show up in his van. CS-1 exited out of the gold Kia Sedona and walked over to the maroon Chevrolet van and opened the rear driver's side door. CS-1 observed MITCHELL seated in the front passenger's seat, an unknown black male and an unknown white male were seated in the rear passenger's seats. CS-1 stated s/he gave MITCHELL the \$1030 of buy money. In return, CS-1 stated MITCHELL gave CS-1 eight Suboxone filmstrips and 20 Oxycodone pills. MITCHELL asked CS-1 if BRZINSKI gave the heroin to CS-1. CS-1 replied, "No". MITCHELL instructed CS-1 to return to the gold Kia Sedona minivan and tell BRZINSKI to give CS-1 the heroin. CS-1 returned to the gold Kia Sedona minivan and asked for the heroin. BRZINSKI gave CS-1 the heroin (suspected fentanyl). After the deal was complete, CS-1 exited BRZINSKI's gold Kia Sedona minivan and walked back over to MDU Agents Knaus and Vandervest's MDU vehicle and turned over the controlled substances to MDU Agent Knaus. MDU Agent Knaus showed a photo of Angela BRZINSKI and Shane TRENTADUE to CS-1. CS-1 was able to positively identify BRZINSKI as the white female driver of the gold Kia Sedona that delivered the heroin to CS-1. CS-1 was able to positively identify TRENTADUE as the white male that was seated in the rear passenger seat of the maroon Chevrolet van.

d. MDU Agent Knaus tested a small sample of the brown chunky/powdery substance utilizing a NARK II test kit and it tested positive for the presence of heroin. MDU Agent Knaus utilized the website Drugs.com to identify the Suboxone film strips and Oxycodone

Hydrochloride 30mg pills.

***Controlled Buy on September 11, 2020.***

28. On September 11, 2020, CS-1 communicated with Ronnie R. Mitchell at (262) 321-4730 to arrange the purchase of 25 Percocet pills, 50 Suboxone filmstrips and 3.5 grams of heroin for a total of \$1600.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus and Agent Donald Vandervest met with CS-1 in order to conduct the heroin (suspected fentanyl), 25 Percocet pills, and 50 Suboxone film strips purchase from Ronnie R. MITCHELL (aka "E"). While in MDU Agents Knaus' presence, MITCHELL called CS-1 from (262) 321-4730. MITCHELL reconfirmed with CS-1 what s/he was purchasing. MITCHELL and CS-1 had several more phone calls/text messages between each other and CS-1 was told by MITCHELL that he was unable to get the Percocet pills. MITCHELL and CS-1 agreed to meet at 12:00 p.m. at the intersection of Case Avenue and DeKoven Avenue in the City of Racine, to complete the drug transaction. MDU Agents Knaus and Vandervest drove CS-1 to the area of drug transaction location. While at the drug transaction location, CS-1 and MITCHELL had several more phone calls between each other. The last phone call from MITCHELL's phone number of (262) 321-4730 was at approximately 12:27 p.m., MITCHELL asked CS-1 if they (CS1 and U/C Agent Knaus) would wait a little bit longer so that MITCHELL could get the Percocet pills. CS-1 told MITCHELL that they (CS-1 and U/C Agent Knaus) would buy the Percocet pills during the next unscheduled drug transaction.

b. At approximately 12:30 p.m., MDU Agents Jeff Chiapete and Jim Muller were conducting surveillance at 2201 20<sup>th</sup> Street #2, Racine, WI. MDU Agents Chiapete and

Muller observed Devereaux A. PATTON exit the residence, enter into the operator's seat of a white Buick Enclave bearing Wisconsin registration AJS-8321, and drive towards the drug transaction location, Case Avenue and DeKoven Avenue, in the City of Racine.

c. At approximately 12:31 p.m., MDU Agent Knaus observed D. PATTON arrive in the white Buick Enclave bearing Wisconsin registration AJS-8321 (DOT check shows the plate registered to a green Oldsmobile Cutlass convertible to Jazmyne MORRIS at 2201 20<sup>th</sup> Street, #2, Racine, WI). MDU Agent Knaus observed D. PATTON park his vehicle directly behind MDU Agents Knaus and Vandervest's MDU vehicle. MDU Agent Knaus observed CS-1 exit the MDU vehicle, walk to the white Buick Enclave, and enter into front passenger's seat. After a short period of time, MDU Agent Knaus observed CS-1 exit the white Buick Enclave and return back to his MDU vehicle. After CS-1 entered the MDU vehicle, Agent Knaus and Vandervest drove out of the area. MDU Agent Knaus retrieved a knotted plastic bag that contained 50 Suboxone filmstrips and a knotted plastic baggie corner containing a gray chunky/powdery substance from CS-1. CS-1 stated s/he met with D. PATTON in the white Buick Enclave in the 1900 block of Case Avenue. CS-1 stated when s/he entered into the vehicle, s/he observed that MITCHELL was on a video chat with D. PATTON. CS-1 stated that s/he spoke with D. PATTON and MITCHELL while inside the vehicle. CS-1 stated s/he gave D. PATTON the \$850 of buy money. D. PATTON gave CS-1 the heroin (suspected fentanyl) and Suboxone film strips.

While inside the white Buick Enclave, MITCHELL told CS-1 to try to get their guy (U/C MDU Agent Knaus) to wait around for the pills. CS-1 told MITCHELL that s/he would try. After the deal was complete, CS-1 exited the white Buick Enclave and walked back over to MDU Agents Knaus and Vandervest's MDU vehicle.

d. MDU Agent Knaus tested a small sample of the gray chunky/powdery substance

utilizing a NARK II test kit and it tested positive for the presence of heroin.

***CS-2 Controlled Buys Information:***

29. Racine County Sheriff's Office-Metro Drug Unit Agents and Task Force Officers from the DEA Tactical Diversion Squad (TDS) 67 from the DEA Milwaukee District Office utilized CS-2 to conduct approximately 43 controlled buys from MITCHELL DTO members from January of 2020 through October of 2020.

***Controlled Buy on March 19, 2020.***

30. On March 19, 2020, CS-2 communicated with Martiese D. HUDSON at (224)

717-6253 to arrange the purchase of 1.0 gram of heroin (suspected fentanyl) for \$120.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus met with CS-2 in order to conduct the heroin (suspected fentanyl) controlled buy from Martiese HUDSON.

b. MDU Agent Knaus had CS-2 complete a recorded phone call to Martiese D. HUDSON at (224) 717-6253. Martiese D. HUDSON answered the phone and CS-2 ordered \$120 worth of heroin (suspected fentanyl). Martiese D. HUDSON told CS-2 that he would meet CS-2 near George's Tavern, 1201 N. Main Street, Racine, WI, to complete the drug transaction.

c. MDU Agent Knaus (working in an undercover capacity) waited with CS-2 in the area of George's Tavern. At approximately 3:30 p.m., MDU Agent Knaus observed HUDSON operating a blue Mitsubishi Outlander bearing Wisconsin temporary registration S2772F arrive and park near George's Tavern. MDU Agent Jeff Chiapete observed CS-2 enter into the front passenger's seat of HUDSON's vehicle. MDU Agent

Chiapete conducted moving surveillance of HUDSON's vehicle and observed CS-2 get dropped off in the 300 block of Barker Street. MDU Agent Chiapete observed CS-2 walk back to MDU Agent Knaus's MDU vehicle. CS-2 entered back into MDU Agent Knaus's vehicle. MDU Agent Knaus retrieved from CS-2 a knotted sandwich baggie corner that contained a gray chunky substance and another knotted sandwich baggie corner that contained a gray powdery substance that was said to be heroin. CS-2 stated s/he met with HUDSON in the blue Mitsubishi Outlander. CS-2 stated s/he gave HUDSON the \$120 of MDU buy money. In return, CS-2 stated HUDSON gave CS-2 two small baggies of heroin. After the deal was complete, CS-2 exited HUDSON's vehicle and walked back over to MDU Agent Knaus's MDU vehicle and turned over the heroin to him.

d. MDU Agent Knaus tested a small sample of the gray powdery substance utilizing a NARK II test kit and it tested positive for the presence of heroin.

e. As soon as the controlled buy was completed, MDU Agent Muller conducted moving surveillance of Hudson's vehicle back to 1630 Kearney Avenue Lower, Racine, WI. MDU Agent Muller observed HUDSON park the blue Mitsubishi Outlander and then walk into the front door of 1630 Kearney Avenue Lower.

***Controlled Buy on July 9, 2020.***

31. On July 9, 2020, CS-2 communicated with Stevie L. PATTON Jr. at (312) 248-5850 to arrange the purchase of 12 Suboxone filmstrips for \$120.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Tom Knaus met with CS-2 in order to conduct the Suboxone film strips controlled buy from PATTON Jr.

b. At approximately 3:08 p.m., MDU Agent Knaus had CS-2 complete a recorded phone call to PATTON Jr. at (312) 248-5850. PATTON Jr. answered the phone and CS-2 ordered \$120 worth of Suboxone filmstrips. PATTON Jr. instructed CS-2 to meet him at the intersection of Dekoven Avenue and Center Street, in the City of Racine, to complete the drug transaction. MDU Agents conducted moving surveillance of CS-2's vehicle over to the intersection of Dekoven Avenue and Center Street.

c. At approximately 3:21 p.m. MDU Agent Knaus observed CS-2 arrive and park in the 800 block of Dekoven Avenue. At the same time that CS-2 arrived, MDU Agent Knaus observed PATTON Jr. exit out of 1913 Center Street, walk over to CS-2's vehicle and enter into the front passenger's seat. A short time later, MDU Agent Knaus observed PATTON Jr. exit out of CS2's vehicle and walk back towards 1913 Center Street. MDU Agent Knaus followed CS-2 back to the predetermined meet location. CS-2 entered back into MDU Agent Knaus's vehicle. MDU Agent Knaus retrieved 12 Suboxone filmstrips from CS-2. CS-2 stated s/he met with PATTON Jr. inside CS-2's vehicle. CS-2 stated s/he gave PATTON Jr. the \$120 of MDU buy money. In return, CS-2 received 12 Suboxone film strips from PATTON Jr. After the deal was complete, PATTON Jr. exited out of CS-2's vehicle and walked back towards 1913 Center Street, Racine, WI. CS-2 drove back to the predetermined meet location and turned over the Suboxone filmstrips to MDU Agent Knaus.

***CS-3 Controlled Buys Information:***

32. Racine County Sheriff's Office-Metro Drug Unit Agents and Task Force Officers from the DEA Tactical Diversion Squad (TDS) 67 from the DEA Milwaukee District Office utilized CS-3 to conduct approximately 35 controlled buys from MITCHELL DTO

members from January of 2020 through October of 2020.

***Controlled Buy on February 6, 2020.***

33. On February 6, 2020, CS-3 communicated with Terry N. MCLAIN at (224) 717-6253 to arrange the purchase of 0.5 grams of heroin for \$60.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Jim Muller met with CS-3 in order to conduct the heroin controlled buy from MCLAIN.

b. MDU Agent Muller had CS-3 complete a recorded phone call to MCLAIN at (224) 7176253. MCLAIN answered the phone and CS-3 ordered \$60 worth of heroin. MCLAIN instructed CS-3 to meet him at 1720 Grand Avenue, in the City of Racine, to complete the drug transaction.

c. MDU Agent Muller drove CS-3 to 1720 Grand Avenue, Racine, WI and parked directly in front of the residence. MDU Agent Muller observed MCLAIN standing on the front steps to 1720 Grand Avenue. At approximately 10:41 a.m., MDU Agent Muller observed CS-3 exit out of his MDU vehicle and meet with MCLAIN. MDU Agent Muller observed CS3 and MCLAIN walk over to the driveway and enter into a gray Chrysler 200 bearing Wisconsin registration 995-ZHY (DOT check of the license plate showed it on a gray 2015 Chrysler 200 to listed owners Samantha L MILLER at 5373 Eastway Apt. 4, Greenfield, WI and Terry MCLAIN at 1720 Grand Avenue, Racine, WI). After a short amount of time, MDU Agent Muller observed CS-3 and MCLAIN exit out of the gray Chrysler 200. MDU Agent Muller observed CS-3 walk back to his MDU vehicle and then they drove out of the area. MDU Agent Muller retrieved a knotted sandwich baggie corner of a gray chunky substance that was said to be heroin. CS-3 stated s/he

gave MCLAIN the \$60 of MDU buy money. In return, CS-3 received the heroin from MCLAIN.

d. After the controlled buy, MDU Agent Bob Christman observed MCLAIN walk into the front door of 1720 Grand Avenue, Racine, WI.

e. MDU Agent Muller tested a small sample of the gray chunky substance utilizing a NARK II test kit and it tested positive for the presence of heroin.

***Controlled Buy on March 25, 2020.***

34. On March 25, 2020, CS-3 communicated with Martiese D. HUDSON at (773) 815-7378 to arrange the purchase of 3.5 grams of cocaine for \$275.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Agent Jim Muller met with CS-3 in order to conduct the cocaine buy from Martiese HUDSON.

b. MDU Agent Muller had CS-3 complete a recorded phone call to HUDSON at (773) 8157378. HUDSON answered the phone and CS-3 ordered \$275 worth of cocaine. HUDSON instructed CS-3 to meet him at the intersection of Howe Street and 16<sup>th</sup> Street. At approximately 3:40 p.m., MDU Agent Muller drove CS-3 to the 1600 block of Howe Street Racine, WI to complete the drug transaction.

c. MDU Agent Knaus was conducting surveillance at HUDSON's residence, 1630 Kearney Avenue Lower, Racine, WI. At approximately 3:46 p.m., MDU Agent Knaus observed HUDSON exit out of his front door to his residence. MDU Agent Knaus observed HUDSON enter into a blue Mitsubishi Outlander bearing Wisconsin temporary registration S2772F. MDU Agent Knaus conducted moving surveillance of the blue Mitsubishi Outlander to the area of the drug transaction.

d. At approximately 3:48 p.m., MDU Agent Muller observed HUDSON arrive in the blue Mitsubishi Outlander. MDU Agent Muller observed HUDSON park directly in front of his MDU vehicle. MDU Agent Muller observed CS-3 exit out of his MDU vehicle, walk over to HUDSON's vehicle, and then enter into the front passenger's seat. After a short period of time, MDU Agent Muller observed CS-3 exit out of HUDSON's vehicle and then enter back into his MDU vehicle. MDU Agent Muller retrieved from CS-3 a knotted sandwich baggie corner that contained a gray chunky substance and another knotted sandwich baggie that contained a white powdery/chunkly substance that was said to be cocaine. CS-3 stated s/he met with HUDSON in the blue Mitsubishi Outlander. CS-3 stated s/he gave HUDSON the \$275 of MDU buy money. In return, CS-3 stated HUDSON gave CS-3 the sandwich baggie filled with cocaine. After the deal was complete, CS-3 exited HUDSON's vehicle and walked back over to MDU Agent Muller's MDU vehicle and turned over the cocaine to him.

e. MDU Agent Muller tested a small sample of the white powdery/chunkly substance utilizing a NARK II test kit and it tested positive for the presence of cocaine.

***Controlled Buy on April 29, 2020.***

35. On April 29, 2020, CS-3 communicated with Deshawn T. CHATMAN at (224) 717-6253 to arrange the purchase of 2.0 grams of heroin for \$230.

a. Racine County Sheriff's Office-Metro Drug Unit (hereinafter referred to as "MDU") Sgt. Dobesh met with CS-3 in order to conduct the heroin buy from Deshawn CHATMAN.

b. At approximately 8:52 a.m., MDU Sgt. Dobesh had CS-3 complete a recorded phone call to CHATMAN at (224) 717-6253. CHATMAN answered the phone and CS-3

ordered \$230 worth of heroin. CHATMAN and CS-3 agreed to meet at a gas station located at the intersection of 6<sup>th</sup> Street and Memorial Drive, in the City of Racine, to complete the drug transaction. MDU Sgt. Dobesh dropped off CS-3 at the Neighborhood Pantry gas station located at 1511 W. 6<sup>th</sup> Street, in the City of Racine, to complete the drug transaction.

c. MDU Agent Vandervest was conducting surveillance at Martiese D. HUDSON's residence, 1630 Kearney Avenue Lower, Racine, WI. At approximately 9:31 a.m., MDU Agent Vandervest observed Deshawn CHATMAN exit out of HUDSON's residence. MDU Agent Vandervest observed CHATMAN enter into a red Ford Focus bearing Wisconsin temporary registration S2781F. MDU Agent Vandervest observed CHATMAN drive out of the area.

d. At approximately 9:34 a.m., MDU Sgt. Dobesh observed CHATMAN arrive in the red Ford Focus. MDU Sgt. Dobesh observed CS-3 enter into the front passenger's seat of the red Ford Focus. MDU Sgt. Dobesh observed CHATMAN drive out of the area with CS-3. MDU Sgt. Dobesh conducted moving surveillance of the red Ford Focus over to 400 block of Luedtke Avenue, in the City of Racine. MDU Sgt. Dobesh observed CS-3 get dropped off and then MDU Sgt. Dobesh picked up CS-3 and drove out of the area. MDU Sgt. Dobesh retrieved from CS-3 two knotted sandwich baggie corners that contained a brownish-gray powdery/chunkly substance that was said to be heroin. CS-3 stated s/he met with CHATMAN in the red Ford Focus. CS-3 stated s/he gave CHATMAN \$120 of MDU buy money, due to CHATMAN not having the agreed upon amount of heroin. In return, CS-3 stated CHATMAN gave CS-3 the two sandwich baggie corners filled with heroin. After the deal was complete, CHATMAN dropped CS-3 off in

the 400 block of Luedtke Avenue. CS-3 was picked up by MDU Sgt. Dobesh and then CS-3 turned over the heroin and the remaining MDU buy money to MDU Sgt. Dobesh.

e. After the controlled buy, at approximately 9:47 a.m., MDU Agent Vandervest observed the red Ford Focus parked back at 1630 Kearney Avenue, Racine, WI.

f. MDU Sgt. Dobesh tested a small sample of the brownish-gray powdery/chunky substance utilizing a NARK II test kit and it tested positive for the presence of heroin.

### **Addresses**

36. **1913 Center Street, Racine, Wisconsin, 53403.** Devereaux A. PATTON's driver license, which was issued on February 7, 2020 and expiring on August 24, 2028, shows D. PATTON using the address of 1913 Center Street, Racine, Wisconsin, 53403. Dawneitha R. GANT's driver license, which was issued on May 9, 2014 and expiring on September 18, 2020, shows GANT using the address of 1913 Center Street, Racine, Wisconsin, 53403. A check of the utilities for 1913 Center Street, Racine, Wisconsin, 53403, on October 19, 2020, revealed the utilities are in Dawneitha GANT's name. The utilities have been in Dawneitha GANT's name since June 18, 2015 and Dawneitha GANT is believed to be D. PATTON's girlfriend or wife.

### ***June 30, 2020 Surveillance of MITCHELL DTO members***

37. Case agents conducted surveillance 1913 Center Street. At approximately 9:50 a.m., MDU Agents observed Brian EDWARDS arrive to 1913 Center Street in a red Chevrolet Sonic. MDU agents observed EDWARDS exit the vehicle and then walk into the residence. After a short period of time, MDU agents observed EDWARDS and Brian N. SAUNDERS Jr. exit the residence and enter back into the vehicle and then drive out of the area.

a. At approximately 11:05 a.m., MDU agents observed Menachin O. BROWN, Stevie L. PATTON, Jr., and April C. DAVIS on the porch at 1913 Center Street, Racine, WI.

b. At approximately 11:07 a.m., MDU Agents observed Ronnie R. MITCHELL arrive at 1913 Center Street, Racine, WI. MDU Agents observed MITCHELL, BROWN, S. PATTON Jr., and DAVIS walk into the residence. At approximately 11:11 a.m., MDU agents observed EDWARDS and SAUNDERS JR. arrive back to the residence and then walk into 1913 Center Street.

***July 13, 2020 Surveillance of MITCHELL DTO members***

38. Case agents conducted surveillance at 1913 Center Street, Racine, WI. At approximately 12:08 p.m., MDU Agents observed Ronnie R. MITCHELL arrive in a brown Ford pick-up truck displaying Wisconsin registration RW7924. MDU Agents observed MITCHELL exit the truck and knock at the front door, with no answer. MDU Agents observed Dawneitha R. GANT arrive in a black Chevrolet Tahoe. MDU Agents observed GANT exit the vehicle and give a package to MITCHELL. MITCHELL placed the package into the truck that he was operating. MDU Agents observed GANT, Stevie L. PATTON Jr., Brian N. SAUNDERS Jr., and April C. DAVIS standing around the truck while MITCHELL was going through the package. *October 23, 2020 Surveillance of MITCHELL DTO members*

39. Case agents conducted surveillance at 1913 Center Street, Racine, WI. At approximately 5:38 p.m., surveillance observed Brian N. SAUNDERS Jr.'s white Pontiac Grand Am displaying

Wisconsin registration 536-YRF parked in front of 1913 Center Street. MDU Agents observed SAUNDERS Jr. enter his vehicle and drive out of the area. At the same time that SAUNDERS Jr. was driving away, MDU Agents observed Dawneitha R. GANT arrive in her black Chevrolet Tahoe bearing Wisconsin registration AHN-2435 (A DOT check showed the vehicle registered to Addrin BROWN on a 2002 Chevy Tahoe).

***October 24, 2020 Surveillance of MITCHELL DTO members***

40. Case agents conducted surveillance at 1913 Center Street, Racine, WI. At approximately 11:04 a.m., surveillance observed Devereaux A. PATTON exit out of the front door and stand on the porch. PATTON was observed speaking with Nicholas BONO (Case agents positively identified him from previous surveillance) who was working on a vehicle that was parked in the driveway. At approximately 11:06 a.m., Case agents observed PATTON walk back into the residence.

a. At approximately 1:24 p.m., case agents observed Brian N. SAUNDERS Jr. exit 1913 Center Street, Racine, WI. enter into his white Pontiac Grand Am, and then drive out of the area.

b. At approximately 1:24 p.m. case agents observed Devereaux A. PATTON drive away from 1913 Center Street in his maroon Chevrolet Express van bearing Wisconsin temporary registration 410V017 (A DOT check showed the vehicle registered to an Alicia VERIKAS).

c. At approximately 1:30 p.m., case agents observed Brian SAUNDERS return back home in his white Pontiac Grand Am and then walk into the front door.

***October 27, 2020 Surveillance of MITCHELL DTO members***

41. At approximately 4:15 p.m., case agents observed Brian SAUNDERS's white Pontiac Grand Am vehicle parked in front of 1913 Center Street.

a. At approximately 5:50 p.m., MDU Agent Donald Vandervest observed Devereaux A. PATTON's maroon Chevrolet Express van parked outside of 1913 Center Street. The surveillance team was able to observe that the DTO members were utilizing a gold Kia Sedona minivan bearing Wisconsin registration KA7936, to deliver controlled substances to their drug clientele. At the same time that PATTON's vehicle was observed parked at 1913 Center Street, MDU Agent Vandervest also observed the gold Kia Sedona minivan parked at the residence. *October 28, 2020 Surveillance of MITCHELL DTO members*

At approximately 4:18 p.m., MDU Agent Christman observed Devereaux A. PATTON drop off Menachin O. BROWN at 1913 Center Street. MDU Agent Christman observed BROWN enter into a silver minivan and then out of the area.

***October 31, 2020 Surveillance of MITCHELL DTO members***

42. At approximately 8:38 a.m., TFO Lewis observed a teal Oldsmobile Cutlass Supreme bearing Wisconsin registration AJS-8274 (A DOT check showed the vehicle registered to Jazmyne MORRIS at 2201 20<sup>th</sup> Street), parked at the residence.

a. At approximately 10:32 a.m., TFO Lewis observed Devereaux A. PATTON open the passenger side door of the teal Oldsmobile Cutlass Supreme, reach in and appeared to be rummaging around inside of the vehicle. TFO Lewis observed D. PATTON close his vehicle's door and start to slowly walk away from the vehicle. As D. PATTON started to walk away from the vehicle an unidentified black male arrived on a bicycle. The black exited off of the bicycle and leaned it up against the teal Oldsmobile Cutlass Supreme. D. PATTON and the unidentified black male walked into the front door. A brief moment later, the black male exited out of the front door of the residence. (TFO Lewis believed

that D. PATTON delivered controlled substance(s) to the black male based on the short term contact). *Court Authorized Intercepted communications*

43. On October 23, 2020, Ronnie R. MITCHELL utilizing 262-321-4730 (**Target Telephone #2**) called Alexander MONETTE at 262-308-3368 (**Target Telephone #1**) and instructed MONETTE to come to Center Street. At the time of MITCHELL's request, MONETTE was selling controlled substances for the MITCHELL DTO at that moment and was doing so at the request of Ronnie R. MITCHELL. Case agents have established 1913 Center Street, Racine, WI as known location for members of the MITCHELL DTO to be at and sell controlled substances. 44. **2201 20<sup>th</sup> Street, Unit #2, Racine, Wisconsin, 53403.** Jazmyne MORRIS's driver license, which was issued on April 20, 2020 and expiring on August 5, 2025, shows MORRIS using the address of 2201 20<sup>th</sup> Street, Unit #2, Racine, Wisconsin, 53403. Your affiant checked the Racine County Sheriff's Office computer database program. Your affiant located a simple assault report that was dated on August 11, 2020, documented under RASO complaint number 20-33720. After review of the report, your affiant learned that MORRIS was described as being D. PATTON's new girlfriend. A check of the Wisconsin Circuit Court Access Program (CCAP) showed on February 22, 2019, Jazmyne MORRIS was charged with a traffic citation and MORRIS used the address of 2201 20<sup>th</sup> Street, Apt. #2, Racine, Wisconsin 53403. A DOT records check indicated MORRIS owned a white 2010 Buick Enclave SUV, Wisconsin license plate AJS-8274, registered to Jazmyne MORRIS residing at 2201 20<sup>th</sup> Street, Unit #2, Mount Pleasant, Wisconsin. A check of the utilities for 2201 20<sup>th</sup> Street, Unit #2, Racine, Wisconsin 53403 on October 19, 2020 revealed the utilities are in Jazmyne MORRIS's name and have been in Jazmyne MORRIS's name since February 24, 2016. *October 23, 2020 Surveillance of MITCHELL DTO members*

45. Case agents conducted surveillance at 2201 20<sup>th</sup> Street, Unit #2. At approximately 6:02 p.m., MDU Agents observed Ronnie R. MITCHELL arrive in a blue Hyundai Sonata bearing Illinois temporary registration 515V239 (A DOT check showed the vehicle registered to a Gina CODY, residing at 6907 N. Oakley Road, Chicago IL 60645). ***October 24, 2020 Surveillance of MITCHELL DTO members***

46. Case agents conducted surveillance at 2201 20<sup>th</sup> Street, Unit #2. At approximately 2:01 p.m., case agents observed Devereaux A. PATTON exit out of the front door and walk to his maroon Chevrolet Express van and drive out of the area.

***October 25, 2020 Surveillance of MITCHELL DTO members***

47. At approximately 8:00 a.m., TFO Lewis observed Devereaux A. PATTON's maroon Chevrolet Express van bearing Wisconsin temporary registration 410V017, parked outside of the residence.

a. At approximately 11:57 a.m., MDU Agent Bob Christman observed Devereaux A. PATTON drive away in his maroon Chevy Express van bearing Wisconsin temporary registration 410V017. At approximately 12:09 p.m., MDU Agent Christman observed PATTON return back to 1913 Center Street.

***October 28, 2020 Surveillance of MITCHELL DTO members***

48. At approximately 1:18 p.m., MDU Agent Jeffery Chiapete and TFO Jessie Lewis observed Ronnie R. MITCHELL, Devereaux A. PATTON, and an unidentified male on a motorcycle, meeting outside of 2201 20<sup>th</sup> Street, Racine, WI. MDU Agent Chiapete and TFO Lewis observed Devereaux A. PATTON seated in his maroon Chevrolet Express van, while the unidentified male on the motorcycle was parked in the street next to the driver's side door of PATTON's van. MDU Agent Chiapete and TFO Lewis were able to

observe MITCHELL operating a white Chevrolet Malibu bearing Wisconsin registration 139-XEH (A DOT check showed the vehicle registered to GKC Title LLC, on a white 2012 Chevy Malibu). TFO Lewis observed MITCHELL grab a large bag out of PATTON's maroon Chevrolet Express van, carry it over to the white Chevrolet Malibu, and place it inside of the vehicle. *October 29, 2020 Surveillance of MITCHELL DTO members*

49. At approximately 8:04 a.m., MDU Agent Castillo observed Devereaux A. PATTON arrive and park in front of the residence. MDU Agent Castillo observed PATTON exit out of the vehicle and walk into Unit #2.
  - a. At approximately 9:04 a.m., TFO Lewis observed Ronnie MITCHELL arrive in his white Chevrolet Malibu, park in front of the residence, and walk into Unit #2.
  - b. At approximately 1:52 p.m., MDU Agent Castillo and TFO Lewis observed Devereaux A. PATTON and Jazmyne MORRIS arrive in a Buick Enclave SUV bearing Wisconsin registration AJS-8274 (A DOT check showed the vehicle registered to Jazmyne MORRIS at 2201 20<sup>th</sup> Street, Unit #2). MDU Agent Castillo and TFO Lewis observed PATTON and MORRIS exit out of the vehicle and walk into 2201 20<sup>th</sup> Street Unit #2. As PATTON and MORRIS were walking into Unit #2, Stevie L. PATTON Jr. arrived in a teal Oldsmobile Cutlass Supreme bearing Wisconsin registration AJS-8274 (A DOT check showed the vehicle registered to Jazmyne MORRIS at 2201 20<sup>th</sup> Street). MDU Agent Castillo and TFO Lewis observed PATTON Jr. park the vehicle, exit out carrying a small blue bag, and then walk into Unit #2. At approximately 2:00 p.m., MDU Agent Castillo and TFO Lewis observed PATTON Jr. exit out of Unit #2 carrying the small bag, return to his vehicle, and then drive out of the area.

***October 31, 2020 Surveillance of MITCHELL DTO members***

50. At approximately 8:37 a.m., TFO Lewis observed Devereaux A. PATTON's maroon Chevrolet Express van parked at 2201 20<sup>th</sup> Street, Racine, WI.

a. At approximately 10:43 a.m., TFO Lewis observed Devereaux A. PATTON arrive at the residence in a teal Oldsmobile Cutlass Supreme, bearing Wisconsin registration AJS-8274 (A DOT check showed the vehicle registered to Jazmyne MORRIS at 2201 20<sup>th</sup> Street). TFO Lewis observed D. PATTON park the vehicle, exit out of the vehicle carrying a grocery bag and then walk into Unit #2.

51. **2207 Mead Street, Lower, Mount Pleasant, Wisconsin, 53403.** Menachin BROWN's driver license, which was issued on March 25, 2019 and expiring on February 27, 2027, shows BROWN using the address of 2207 Mead Street, Lower, Mount Pleasant, Wisconsin, 53403. A check of the Wisconsin Circuit Court Access Program (CCAP) showed on June 7, 2019, Devereaux PATTON was charged with two misdemeanors, and D. PATTON used the address of 2207 Mead Street, Racine, Wisconsin 53403. A DOT records check indicated BROWN owned a red 1988 Chevrolet Beretta coupe, Wisconsin VIN: 1G1LV14WXJY651439, registered to Menachin BROWN residing at 2207 Mead Street Lower, Mount Pleasant, Wisconsin. A check of the utilities for 2207 Mead Street, Lower, Mount Pleasant, Wisconsin, 53403 on October 19, 2020 revealed the utilities are in Jennifer SCHWARTZ's name and have been in Jennifer SCHWARTZ's name since January 24, 2017

***October 30, 2020 Surveillance of MITCHELL DTO members***

52. On October 30, 2020, at approximately 9:23 a.m., MDU Agent Drew Wroblewski observed Menachin BROWN operating his red Ford Mustang, bearing Wisconsin

registration AKB-3725 (A DOT check showed the vehicle registered to Jennifer SCHWARTZ at 2207 Mead Street Lower, Mount Pleasant, WI). MDU Agent Wroblewski observed BROWN park his vehicle in front of 2207 Mead Street.

a. At approximately 12:51 p.m., FBI Gang Task Force Officer Kurt Heiser observed BROWN's red Ford Mustang parked at the residence.

***October 31, 2020 Surveillance of MITCHELL DTO members***

53. At approximately 12:29 p.m., MDU Agent Robert Christman observed BROWN's red Ford Mustang parked at the residence.

a. At approximately 2:20 p.m., FBI Gang Task Force Officer Mark Haleen observed Menachin O. BROWN and Jennifer SCHWARTZ exit out of their residence, enter into a gray Chrysler Pacifica bearing Wisconsin registration AJE-8576 (A DOT check showed the plate registered to EAN Holdings on a gray 2020 Chrysler Pacifica), and drive out of the area.

b. At approximately 2:23 p.m., MDU Agent Christman observed the gray Chrysler Pacifica return back to the residence. FBI Gang Sgt. Thillemann observed the vehicle back into the driveway. MDU Agent Christman observed BROWN grab the mail out of the mailbox and walk back into 2207 Mead Street, Lower.

54. **1630 Kearney Avenue, Lower, Racine, Wisconsin, 53405.** Martiese HUDSON's driver license, which was issued on February 27, 2020 and expiring on December 4, 2028, shows HUDSON using the address of 1630 Kearney Avenue Lower, Racine, Wisconsin, 53405. A DOT records check indicated HUDSON owned a green 2005 Chevrolet Tahoe SUV, Wisconsin VIN: 1GNEK13T55R123010, registered to Martiese Deon HUDSON, residing at 1630 Kearney Avenue Lower, Racine, Wisconsin,

53405. A check of the utilities for 1630 Kearney Avenue, Lower, Racine, Wisconsin, 53405 on October 19, 2020 revealed utilities are in Jacqueline FREEMAN's name and have been in Jacqueline FREEMAN's name since July 10, 2019.

***October 26, 2020 Surveillance of MITCHELL DTO members***

55. On October 26, 2020, surveillance observed Stevie L. PATTON, Jr. and April C. DAVIS operating a DTO rental vehicle a gold Kia Sedona bearing Wisconsin registration KA7936. Surveillance was able to observe PATTON Jr. and DAVIS make numerous deliveries of controlled substances based on court authorized intercepted phone calls of 262-308-3368 (**Target Telephone #1**). At approximately 10:59 a.m., after receiving an intercepted phone call, surveillance observed PATTON Jr. and DAVIS deliver a controlled substance(s) to a DTO drug customer at the intersection of 17<sup>th</sup> Street and Boyd Avenue, in the City of Racine. After the delivery and at approximately 11:12 a.m., MDU Agent Castillo observed PATTON Jr. and DAVIS drive over to 1630 Kearney Avenue and park their vehicle. MDU Agent Castillo observed PATTON Jr. and DAVIS exit their vehicle and walk into the front door of 1630 Kearney Avenue Lower, Racine, WI.

***October 31, 2020 Surveillance of MITCHELL DTO members***

56. At approximately 2:35 p.m., MDU Agent Muller observed Martiese D. HUDSON exit the front door of 1630 Kearney Avenue Lower, Racine, WI, enter the green Chevy Tahoe bearing Wisconsin registration AHN-2416 (A DOT check showed the vehicle registered to Martiese HUDSON at 1630 Kearney Avenue Lower, Racine, WI 53405), and drive out of the area.

57. **645 S. Green Bay Road, Apt. #4, Racine, Wisconsin, 53403.** Alexander MONETTE's driver license, which was issued on January 14, 2014 and expiring on

January 18, 2022, shows MONETTE using the address of 645 S. Green Bay Road, Apt. #4 Racine, Wisconsin, 53406. A check of the Wisconsin Circuit Court Access Program (CCAP) showed on July 13, 2020, Alexander MONETTE had a civil judgment filed against him and MONETTE used the address of 645 S. Green Bay Road, Apt. #4 Racine, Wisconsin, 53406. A DOT records check indicated MONETTE owned a silver 2007 Saturn Relay Van, Wisconsin VIN: 5GZDV531X7D120930, registered to Alexander MONETTE residing at 645 S. Green Bay Road, Apt. #4 Racine, Wisconsin, 53406. A check of the utilities for 645 S. Green Bay Road, Apt. #4 Racine, Wisconsin, 53406 on October 19, 2020 revealed the utilities are in Annette THOMAS's name and have been in Annette THOMAS's name since June 13, 2015.

*November 1, 2020 Surveillance of MITCHELL DTO members*

58. On November 1, 2020, at approximately 10:00 a.m., TFO Steve Deschler observed Alexander MONETTE exit the west door of 645 S. Green Bay Road, Racine, WI and walk to a black Chevrolet Trax displaying Wisconsin license plate 198WBS. MONETTE opened the doors of the vehicle, reached into the back area of the vehicle, and then went back into the apartment building utilizing the west door.

59. On November 1, 2020, at approximately 12:35 p.m., TFO Simons reported Alexander MONETTE arrived at 645 S. Green Bay Road and he was driving a black Chevrolet Trax displaying Wisconsin 198WBS.

60. On November 1, 2020, at approximately 12:46 p.m., TFO Simons reported Alexander MONETTE left 645 S. Green Bay Road and he was driving the black Chevrolet Trax displaying Wisconsin 198WBS.

61.       **1931 Mead Street, Racine, Wisconsin, 53403.** Ronnie MITCHELL's Illinois driver's license, which was issued on April 18, 2018 and expiring on January 20, 2022, shows MITCHELL using the address of 3912 W. Lexington Street, Chicago, IL 60624. A check of the utilities for 1931 Mead Street, Racine, Wisconsin, 53406 on October 27, 2020 revealed the utilities are in Kimberly STEWART's name and have been in Kimberly STEWART's name since May 1, 2020.

***October 27, 2020 Surveillance of MITCHELL DTO members***

62.       On October 27, 2020, at approximately 7:24 p.m., MDU Agent Drew Wroblewski observed a white Chevy Malibu, bearing Wisconsin registration 139-XEH, being driven into the garage at 1931 Mead Street, Racine, WI. The garage is connected to the residence. During the course of conducting surveillance on the DTO members, surveillance only observed MITCHELL operating the white Chevrolet Malibu (A DOT check showed the vehicle registered to GKC Title, a rental car company).

***October 30, 2020 Surveillance of MITCHELL DTO members***

63.       On October 30, 2020, MDU Agent Castillo observed a white Chevrolet Malibu bearing Wisconsin registration 139-XEH back out of the garage located at 1931 Mead Street, Racine, WI. MDU Agent Castillo saw that Ronnie R. MITCHELL was driving the white Chevrolet Malibu. The surveillance team followed MITCHELL to the intersection of 20<sup>th</sup> Street and Clark Street and observed MITCHELL complete a quick hand-to-hand exchange with Angela M. BRZINSKI, who was working the "dope phone" by selling controlled substances for the MITCHELL DTO.

#### **IV. CONCLUSION**

64. Based on the information below, I believe that probable cause exists to believe that in the State and Eastern District of Wisconsin, and elsewhere, Ronnie R. MITCHELL, Devereaux A. PATTON, Stevie L. PATTON Jr., Martiese D. HUDSON, Joseph HARMON, Brian J. EDWARDS, Terry N. MCLAIN, DeShawn T. CHATMAN, Joseph C. KNILANS, Angela M. BRZINSKI, April C. DAVIS, Anna N. LAWRENCE, Menachin O. BROWN, Willie CHATMAN, Dawneitha R. GANT, and others have committed, are committing, and will commit violations of Title 21, United States Code, Sections 841 and 846 (illegal narcotics distribution (heroin, fentanyl, and cocaine) and illegal narcotics trafficking conspiracy (heroin, fentanyl, and cocaine)).

65. Based on the facts contained within this affidavit, I further believe that probable cause exists to believe that evidence of the offenses described above will be found in the following locations:

- a. 1913 Center Street, Racine, Wisconsin 53403. This property is utilized by Devereaux A. PATTON and Dawneitha R. GANT. Described as a one-story, single-family residence located on Center Street. The residence has yellow siding and red brick, white trim, and gray shingled roof. The numbers of 1913 are displayed on a white column that is on the left side of the front porch that is located on the west side of the residence. The entry/exit door is located on the west side of the residence.
- b. 645 S. Green Bay Road, Apt. #4, Racine, WI 53403. This property is utilized by Alexander MONETTE. Described as a two-story, multi-family residence apartment building located on S. Green Bay Road. The residence has red brick and tan siding, white trim, and gray shingled roof. The numbers of 645 are displayed on a balcony on the west side of the apartment building. The entry/exit doors are located on the north side, east side, and west side of the apartment building.
- c. 1630 Kearney Avenue, Lower, Racine, WI 53405. This property is utilized by Martiese D. HUDSON. Described as a two-story, multi-family residence located on Kearney Avenue. The residence has tan siding and red brick, tan trim, and black shingled roof. The numbers of 1630 are displayed on a tan column that is on the right side of the

front porch that is located on the east side of the residence. The entry/exit door is located on the east side of the residence.

d. 2207 Mead Street, Lower, Racine, WI 53403. This property is utilized by Menachin O. BROWN and Jennifer SCHWARTZ. Described as a two-story, multi-family residence located on Mead Street. The residence has red siding and brown brick, white trim, and gray shingled roof. The numbers of 2207 are displayed on the right side of the front door frame that is located on the west side of the residence. The entry/exit door is located on the west side of the residence.

e. 2201 20<sup>th</sup> Street, Unit #2, Racine, WI 53403. This property is utilized by Devereaux A. PATTON and Jazmyne MORRIS. Described as a one-story, multi-family residence located on 20<sup>th</sup> Street. The residence has charcoal gray siding, white trim, and black shingled roof. The numbers of 2201 are displayed on the gray siding on the north side of the residence. The number 2 is attached to the right side of the entry door. The entry/exit door has a white colored screen door and is located on the west side of the residence.

f. 1931 Mead Street, Racine, WI 53403. This property is utilized by Ronnie R. MITCHELL and Kimberly STEWARD. Described as a two-story, multi-family residence located on Mead Street. The residence has tan and brown siding, white trim, and brown shingled roof. The numbers of 1931 are displayed on the tan siding, to the left of the garage door. The entry/exit door has a brown colored screen door and is located on the north side of the residence.

## **ATTACHMENT A**

2207 Mead Street, Lower, Racine, WI 53403. This property is utilized by Menachin O. BROWN and Jennifer SCHWARTZ. Described as a two-story, multi-family residence located on Mead Street. The residence has red siding and brown brick, white trim, and gray shingled roof. The numbers of 2207 are displayed on the right side of the front door frame that is located on the west side of the residence. The entry/exit door is located on the west side of the residence.



## ATTACHMENT B

### Items to be Seized

- 1) Controlled substances, including fentanyl and heroin, packaging materials, controlled substances paraphernalia, and other contraband related to drug trafficking and distribution;
- 2) All records, books, ledgers, records, documents, notes, memoranda or other writings which may be evidence of narcotic or fentanyl/heroin trafficking or which may be evidence of the location of assets derived from controlled substance or fentanyl/heroin trafficking;
- 3) Photographs, film, video tape, audio tape, electronic communication and storage devices, cellular telephones, electronic tablets and pagers along with all electronic information stored in these devices, phones and pagers, which may be evidence of narcotic or fentanyl/heroin trafficking or which may be evidence of the location of assets derived from controlled substance or fentanyl/heroin trafficking;
- 4) Bank account records, loan documents, wire transfer records, money order receipts, postal express mail envelopes, UPS, Fed.Ex, and other mail service receipts and records, bank statements, safes, safe deposit box keys and records, storage location keys and records, money containers, financial records and notes showing payment, receipt, concealment, transfer, or movement of money generated from the sale of controlled substances, or financial transactions related to the trafficking of controlled substances.;
- 5) Safe deposit box records, safe deposit box keys, safes, lock boxes, storage facility records and keys, which may be evidence of narcotic or fentanyl/heroin trafficking or which may be evidence of the location of assets derived from controlled substance or fentanyl/heroin trafficking;
- 6) Business, payroll benefits, source of income records, which may be evidence of narcotic or fentanyl/heroin trafficking or which may be evidence of the location of assets derived from controlled substance or fentanyl/heroin trafficking;
- 7) Real estate contracts, real estate appraisals, real estate maintenance records, which may be evidence of narcotic or fentanyl/heroin trafficking or which may be evidence of the location of assets derived from controlled substance or fentanyl/heroin trafficking;
- 8) Assets, jewelry, precious metals, and cash received from the sale of controlled substances, and any papers, documents and items evidencing the obtaining, secreting, transferring, or concealment of assets, jewelry, precious metals or cash received from the sale of controlled substances, or identifying the purchase, distribution, and facilitation of controlled substance or fentanyl/heroin trafficking;
- 9) The seizure is to include the opening, search and removal, if necessary, of any safe or other locked container, receptacle or any other container, in which some or all of the property hereto described in section 1) though 8) may be contained,